

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:23-cv-00641-JRG-RSP

JURY TRIAL DEMANDED

DEFENDANTS' UNOPPOSED MOTION TO EXTEND DEADLINE

Defendants Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (collectively, “Defendants” or “Samsung”) respectfully requests to extend the deadline for its Reply in support of its Motion for Sanctions Under Fed. R. Civ. P. 37(E)(1) (Dkt. 59) (the “Motion”) by 7 days from February 25, 2025 to March 4, 2025.

The Motion was filed on January 28, 2025 and served at 5:02 p.m. Central Time. Headwater’s response to the Motion was due on February 12, 2025. On February 10, 2025, Headwater filed an unopposed motion to extend its response deadline (the “Motion to Extend”) by 6 days, from February 12, 2025 to February 18, 2025. *See* Dkt. 62. On February 12, 2025, the Court granted Headwater’s Motion to Extend, “noting that it is unopposed.” *See* Dkt. 64.

As noted in Samsung’s response to Headwater’s Motion to Extend (Dkt. 63), because Samsung did not believe that Headwater had good cause for the requested extension, Samsung’s non-opposition was expressly conditioned on two things, which Headwater failed to note to the Court:

- ***First***, Samsung would “receive a reciprocal one week extension for its Reply (from February 25th to March 4th).” Dkt. 63-1 at 1.
- ***Second***, Headwater’s Opposition will not discuss or cite to any events that arise, at

deposition or otherwise (e.g., by declarations), after February 11. *Id.*

Headwater agreed to file its “unopposed motion with that understanding.” *Id.*

Thus, Plaintiffs do not oppose Samsung’s requested extension. Moreover, the requested extension is not sought for the purpose of delay and will not require extension of any other deadlines. Finally, good cause supports granting Samsung’s request, which would allow Samsung sufficient time to address any issues raised in Headwater’s response.

Dated: February 12, 2025

Respectfully submitted,

By: /s/ Jared Hartzman

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ATTORNEYS FOR DEFENDANTS
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CERTIFICATE OF CONFERENCE

Counsel for Plaintiff and counsel for Defendants have met and conferred in compliance with Local Rule CV-7(h). Plaintiff does not oppose this motion.

/s/ Jared Hartzman

Jared Hartzman

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on February 12, 2025. As of this date, all counsel of record had consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Jared Hartzman

Jared Hartzman